

**From:** John L. Stechschulte  
**Sent:** Saturday, November 15, 2014 12:08 PM  
**To:** CEQA Guidelines  
**Subject:** SB 743

15 November 2014

Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

Sent by email to [CEQA.Guidelines@ceres.ca.gov](mailto:CEQA.Guidelines@ceres.ca.gov)

Dear Mr. Calfee,

I'm writing to comment on the draft guidelines for implementation of SB 743.

We are excited about the new guidelines because elimination of automobile congestion as a measure of environmental impact is essential to meeting the original goals of the California Environmental Quality Act. Current CEQA practice has the perverse effect of encouraging faster automobile travel at the expense of bicycle safety. In fact, removal of a mixed travel lane to install a bicycle lane may be considered to have a significant impact on the environment and trigger an extensive review, while the removal of the bike lane to add a mixed travel lane would not.

Increasing bicycling is an official goal of the state of California, as enshrined in the creation of the Active Transportation Program. More bicycling is also an important environmental goal that should be enabled by environmental analysis and regulations. Cities that enable bicycling by creating dedicated and protected space for safe riding have experienced an increase in riding. In turn, more bicycling improves the health of residents. Therefore, we strongly support the draft guidelines with the specific recommendations that follow:

- We support the use of vehicle miles traveled as a replacement for automobile congestion.
- We strongly support the inclusion of a requirement to analyze the impacts of a transportation or development project on bicycle safety.
- Please keep bicycling listed as an appropriate mitigation measure.
- Apply the guidelines to the whole state as soon as possible.

We strongly support the direction you're going with these new guidelines. If adopted in final form, environmental analysis will improve to support health, safety, and prosperity in our communities.

Sincerely,  
John Stechschulte